

**CH-100****Request for Civil Harassment  
Restraining Orders**

Read *Can a Civil Harassment Restraining Order Help Me?* (form CH-100-INFO) before completing this form. Also fill out *Confidential CLETS Information* (form CLETS-001) with as much information as you know.

**1 Person Seeking Protection**

- a. Your Full Name: Courtney Michelle Love-Cobain Age: 54  
 Your Lawyer (if you have one for this case)  
 Name: Matthew J. Cave State Bar No.: 280704  
 Firm Name: King, Holmes, Paterno & Soriano, LLP
- b. Your Address (If you have a lawyer, give your lawyer's information. If you do not have a lawyer and want to keep your home address private, you may give a different mailing address instead. You do not have to give telephone, fax, or e-mail.)  
 Address: 1900 Ave. of the Stars, 25th Flr.  
 City: Los Angeles State: CA Zip: 90067  
 Telephone: 310-282-8989 Fax: \_\_\_\_\_  
 E-Mail Address: MCave@khpslaw.com

Clerk stamps date here when form is filed.

**FILED**  
 Superior Court of California  
 County of Los Angeles

DEC 10 2018

Sherri R. Carter, Executive Officer/Clerk of Court  
 By Mayra Salazar, Deputy  
 Mayra Salazar

Fill in court name and street address:

**Superior Court of California, County of  
 Los Angeles**  
 111 N. Hill St.  
 Los Angeles, CA 90012

Court fills in case number when form is filed.

Case Number:

18STR008759

**2 Person From Whom Protection Is Sought**

Full Name: Osama Lutfi (aka Sam Lutfi) Age: 44  
 Address (if known): 12629 Caswell Ave., Apt. P2  
 City: Los Angeles State: CA Zip: 90066

**3 Additional Protected Persons**

- a. Are you asking for protection for any other family or household members? ☒ Yes ☐ No If yes, list them:
- | Full Name                   | Sex      | Age       | Lives with you?   | How are they related to you? |
|-----------------------------|----------|-----------|---|------------------------------|
| <u>Frances Bean Cobain</u>  | <u>F</u> | <u>26</u> | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | <u>Daughter</u>              |
| <u>Jaimee Rochelle King</u> | <u>F</u> | <u>48</u> | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | <u>Sister</u>                |
| _____                       | _____    | _____     | <input type="checkbox"/> Yes <input type="checkbox"/> No            | _____                        |
| _____                       | _____    | _____     | <input type="checkbox"/> Yes <input type="checkbox"/> No            | _____                        |

☐ Check here if there are more persons. Attach a sheet of paper and write "Attachment 3a—Additional Protected Persons" for a title. You may use form MC-025, Attachment.

b. Why do these people need protection? (Explain below):

- ☒ Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 3b—Why Others Need Protection" for a title.

**This is not a Court Order.**

Case Number:

**4 Relationship of Parties**

How do you know the person in (2)? (Explain below):

☐ Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 4—Relationship of Parties" for a title.

Mr. Lutfi had been friends with Courtney and they had a business relationship.

**5 Venue**

Why are you filing in this county? (Check all that apply):

- a. ☒ The person in (2) lives in this county.  
 b. ☒ I was harassed by the person in (2) in this county.  
 c. ☐ Other (specify): \_\_\_\_\_

**6 Other Court Cases**

a. Have you or any of the persons named in (3) been involved in another court case with the person in (2)?

☒ Yes ☐ No (If yes, check each kind of case and indicate where and when each was filed.)

Kind of Case	Filed in (County/State)	Year Filed	Case Number (if known)
(1) <input type="checkbox"/> Civil Harassment	_____	_____	_____
(2) <input type="checkbox"/> Domestic Violence	_____	_____	_____
(3) <input type="checkbox"/> Divorce, Nullity, Legal Separation	_____	_____	_____
(4) <input type="checkbox"/> Paternity, Parentage, Child Custody	_____	_____	_____
(5) <input type="checkbox"/> Elder or Dependent Adult Abuse	_____	_____	_____
(6) <input type="checkbox"/> Eviction	_____	_____	_____
(7) <input type="checkbox"/> Guardianship	_____	_____	_____
(8) <input type="checkbox"/> Workplace Violence	_____	_____	_____
(9) <input type="checkbox"/> Small Claims	_____	_____	_____
(10) <input type="checkbox"/> Criminal	_____	_____	_____
(11) <input checked="" type="checkbox"/> Other (specify): Co-defendants in civil dispute	Los Angeles, CA	2018	BS163865

b. Are there now any protective or restraining orders in effect relating to you or any of the persons in (3) and the person in (2)? ☒ No ☐ Yes (If yes, attach a copy if you have one.)

**7 Description of Harassment**

Harassment means violence or threats of violence against you, or a course of conduct that seriously alarmed, annoyed, or harassed you and caused you substantial emotional distress. A course of conduct is more than one act.

a. Tell the court about the last time the person in (2) harassed you.

(1) When did it happen? (provide date or estimated date): June 2018 to present

(2) Who else was there?

Please see declarations

**This is not a Court Order.**

Case Number:

7 a. (3) How did the person in (2) harass you? (Explain below):

☒ Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 7a(3)—Describe Harassment" for a title.

(4) Did the person in (2) use or threaten to use a gun or any other weapon?

☐ Yes ☒ No (If yes, explain below):

☐ Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 7a(4)—Use of Weapons" for a title.

(5) Were you harmed or injured because of the harassment?

☐ Yes ☒ No (If yes, explain below):

☐ Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 7a(5)—Harm or Injury" for a title.

(6) Did the police come? ☐ Yes ☒ No

If yes, did they give you or the person in (2) an Emergency Protective Order? ☐ Yes ☐ No

If yes, the order protects (check all that apply):

☐ Me ☐ The person in (2) ☐ The persons in (3).

(Attach a copy of the order if you have one.)

b. Has the person in (2) harassed you at other times?

☐ Yes ☒ No (If yes, describe prior incidents and provide dates of harassment below):

☐ Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 7b—Previous Harassment" for a title.

**This is not a Court Order.**



Case Number:

Check the orders you want. ☒**8 ☒ Personal Conduct Orders**I ask the court to order the person in (2) **not** to do any of the following things to me or to any person to be protected listed in (3):

- a. ☒ Harass, intimidate, molest, attack, strike, stalk, threaten, assault (sexually or otherwise), hit, abuse, destroy personal property of, or disturb the peace of the person.
- b. ☒ Contact the person, either directly or indirectly, in any way, including, but not limited to, in person, by telephone, in writing, by public or private mail, by interoffice mail, by e-mail, by text message, by fax, or by other electronic means.
- c. ☐ Other (specify):  
☐ Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 8c—Other Personal Conduct Orders," for a title.

The person in (2) will be ordered not to take any action to get the addresses or locations of any protected person unless the court finds good cause not to make the order.

**9 ☒ Stay-Away Orders**a. I ask the court to order the person in (2) to stay at least 100 yards away from (check all that apply):

- (1) ☒ Me. (8) ☐ My vehicle.
- (2) ☒ The other persons listed in (3). (9) ☐ Other (specify):
- (3) ☒ My home.
- (4) ☒ My job or workplace.
- (5) ☐ My school.
- (6) ☐ My children's school.
- (7) ☐ My children's place of child care.

b. If the court orders the person in (2) to stay away from all the places listed above, will he or she still be able to get to his or her home, school, or job? ☒ Yes ☐ No (If no, explain below):

☐ Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 9b—Stay-Away Orders," for a title.

**10 ☐ Guns or Other Firearms and Ammunition**Does the person in (2) own or possess any guns or other firearms? ☐ Yes ☐ No ☒ I don't know

If the judge grants a protective order, the person in (2) will be prohibited from owning, possessing, purchasing, receiving, or attempting to purchase or receive a gun, other firearm, and ammunition while the protective order is in effect. The person in (2) will also be ordered to turn in to law enforcement, or sell to or store with a licensed gun dealer, any guns or firearms within his or her immediate possession or control.

**This is not a Court Order.**

Case Number:

**11** ☒ **Temporary Restraining Order**

I request that a Temporary Restraining Order (TRO) be issued against the person in ② to last until the hearing. I am presenting form CH-110, *Temporary Restraining Order*, for the court's signature together with this *Request*.

Has the person in ② been told that you were going to go to court to seek a TRO against him/her?

☐ Yes ☒ No (If you answered no, explain why below):

☒ Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 11—Temporary Restraining Order" for a title.

**12** ☐ **Request to Give Less Than Five Days' Notice of Hearing**

You must have your papers personally served on the person in ② at least five days before the hearing, unless the court orders a shorter time for service. (Form CH-200-INFO explains What Is "Proof of Personal Service"? Form CH-200, Proof of Personal Service, may be used to show the court that the papers have been served.)

If you want there to be fewer than five days between service and the hearing, explain why below:

☐ Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 12—Request to Give Less Than Five Days' Notice" for a title.

**13** ☒ **No Fee for Filing or Service**

- a. ☒ There should be no filing fee because the person in ② has used or threatened to use violence against me, has stalked me, or has acted or spoken in some other way that makes me reasonably fear violence.
- b. ☐ The sheriff or marshal should serve (notify) the person in ② about the orders for free because my request for orders is based on unlawful violence, a credible threat of violence, or stalking.
- c. ☐ There should be no filing fee and the sheriff or marshal should serve the person in ② for free because I am entitled to a fee waiver. (You must complete and file form FW-001, Application for Waiver of Court Fees and Costs.)

**14** ☐ **Lawyer's Fees and Costs**

I ask the court to order payment of my ☐ lawyer's fees ☐ Court costs.

The amounts requested are:

<u>Item</u>	<u>Amount</u>	<u>Item</u>	<u>Amount</u>
_____	\$ _____	_____	\$ _____
_____	\$ _____	_____	\$ _____
_____	\$ _____	_____	\$ _____

☐ Check here if there are more items. Put the items and amounts on the attached sheet of paper or form MC-025 and write "Attachment 14—Lawyer's Fees and Costs" for a title.

**This is not a Court Order.**



Case Number:

**15** ☐ **Possession and Protection of Animals**

I ask the court to order the following:

- a. ☐ That I be given the sole possession, care, and control of the animals listed below, which I own, possess, lease, keep, or hold, or which reside in my household.  
*(Identify animals by, e.g., type, breed, name, color, sex.)*

I request sole possession of the animals because *(specify good cause for granting order)*:

- ☐ Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 15a—Possession of Animals" for a title.

- b. ☐ That the person in ② must stay at least \_\_\_\_\_ yards away from, and not take, sell, transfer, encumber, conceal, molest, attack, strike, threaten, harm, or otherwise dispose of, the animals listed above.

**16** ☐ **Additional Orders Requested**I ask the court to make the following additional orders *(specify)*:

- ☐ Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 16—Additional Orders Requested," for a title.

**17** Number of pages attached to this form, if any: 16Date: 12/10/2018Matthew J. Cave

Lawyer's name (if any)

  
 Lawyer's signature

I declare under penalty of perjury under the laws of the State of California that the information above and on all attachments is true and correct.

Date: 12/10/2018Courtney Michelle Love-Cobain

Type or print your name

DocuSigned by:  
  
 Sign your name

**This is not a Court Order.**

SHORT TITLE:

Love-Cobain v. Lutfi

CASE NUMBER:

ATTACHMENT (Number): 3b, 7a(3), 11

(This Attachment may be used with any Judicial Council form.)

## Attachment 3b—Why Others Need Protection

Mr. Lutfi has been sending harassing, threatening, and vulgar messages to Frances and Jaimee since at least this past summer, examples of which are attached to their declarations submitted herewith. Mr. Lutfi also has been harassing Frances and Jaimee by calling them at all hours of the day and night, generally from an unidentified phone, and verbally attacking whoever answers the phone. Mr. Lutfi seems to transition his abuse from one family member to the next based on who he is able to contact.

## Attachment 7a(3)—Describe Harassment

Mr. Lutfi was previously friends with Courtney, and they had a business relationship. Their relationship soured, however, and Courtney has tried to sever all ties with Mr. Lutfi. Since at least this past summer, Mr. Lutfi has been harassing Courtney and her family in various ways, including, for example, by: (1) sending threatening and vulgar messages; (2) calling repeatedly and verbally attacking whoever answers the phone; (3) threatening to exploit the family's private information; and (4) spreading inaccurate and false information about the family. Mr. Lutfi's vitriol and harassment of Courtney and her family has intensified since they have taken steps to prevent Mr. Lutfi from contacting them. For additional information regarding Mr. Lutfi's harassment, please see the declarations submitted herewith.

## Attachment 11—Temporary Restraining Order

Mr. Lutfi was not informed that Courtney, Frances, and Jaimee would be seeking a TRO against him because they fear—based on Mr. Lutfi's increasingly threatening behavior toward them—that he may respond with even greater abuse or with violence.

(If the item that this Attachment concerns is made under penalty of perjury, all statements in this Attachment are made under penalty of perjury.)

Page 1 of 1

(Add pages as required)

## **DECLARATION OF COURTNEY MICHELLE LOVE-COBAIN**

I, Courtney Michelle Love-Cobain, declare as follows:

1. I met Osama "Sam" Lutfi in approximately 2010. He became a friend over time, and eventually became a trusted advisor. I gave Mr. Lutfi direct access to my business, personal, and financial affairs, and asked him to serve as a buffer between me and others. Over the approximately eight years Mr. Lutfi was in my life, I trusted him with significant personal and confidential information. With the benefit of hindsight, this was a huge mistake.

2. Earlier this year, I decided to take more control over my life, including permanently terminating my relationship with Mr. Lutfi. He had become increasingly verbally abusive to me and others around me, and overly controlling of my business, personal, and financial affairs. I also became concerned that he was abusing my trust, acting on my behalf without my consent, and also monitoring my communications without my consent. This past summer, I asked my sister, Jaimee King, an experienced corporate attorney and the General Counsel of a cyber-security company, to help me terminate my unhealthy relationship with Mr. Lutfi.

3. At my request, Jaimee met with my personal attorney and personal accountant to better understand my business affairs and finances. In addition, Jaimee met with Mr. Lutfi to discuss the termination of our business relationship. During that meeting, Jaimee asked Mr. Lutfi for information about certain money he claimed I owed him, and Mr. Lutfi became verbally abusive to Jaimee. The intensity of Mr. Lutfi's verbal abuse toward both of us has grown significantly since that time.

4. I have attached a few examples of the abusive text messages that Mr. Lutfi has recently sent me. In these messages, he has called me a "worthless cunt"; has threatened to exploit my family's private information by stating "all your shit is going public Friday morning . . don't say you weren't warned"; told me to "go fuck yourself"; and told me to "go choke on opiates and die."



5. In addition to sending me highly intimidating, harassing, and threatening text messages, Mr. Lutfi has harassed and abused me by calling my cell phone and home phone repeatedly, at all hours of the day and night. Although I have repeatedly blocked and avoided answering unidentified calls on my phones, there were a few occasions where I did answer (not knowing it was him) and the language that he used on such calls was similar to what appears in the attached text messages.

6. I also believe that Mr. Lutfi is harassing me through various social media alias accounts by posting disparaging remarks about me and members of my family on my public social media pages. For example, on Saturday, December 8, 2018, someone with the username "datbishdanky," with a profile that includes the phrase "SamLutfi'sCookieJar," posted on my Instagram page: "Hopefully there is a sealed indictment with your name on it Michelle lol," apparently referencing me, as Michelle is my middle name. I have continued to block new accounts that I believe are associated with Mr. Lutfi.

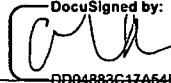
7. After the termination of my business relationship from Mr. Lutfi, I believe he maintained access to several of my email accounts and monitored my text messages and emails. I have since discovered several email messages sent from my accounts to various parties asking for favors for Mr. Lutfi and his associates; these emails were purportedly from me. In fact, I did not write these emails. I believe they were almost certainly sent by Mr. Lutfi for his own benefit. Although I was recently able to reestablish control of these accounts, I have received multiple notifications that a party I believe to be Mr. Lutfi has continued to attempt to regain account access.

8. Mr. Lutfi's abusive behavior has disturbed, upset, and disrupted our family. I have hired experts in surveillance to survey my home, put in new levels of personal security, changed all my electronic devices (some multiple times), and changed my telephone number multiple times. Nonetheless, Mr. Lutfi persists in finding a way to overcome these measures and contact me. Mr. Lutfi knows where I live, how to contact my friends and work associates, and where my family lives. Based on my experience with Mr. Lutfi and considering his notorious reputation of

harassment and abuse, I believe that Mr. Lutfi will stop at nothing to attempt to harm me, my reputation, my career, and my emotional well-being. His behavior toward me and his messages are both highly offensive and downright frightening. I fear that his behavior toward me will continue unless and until he is ordered by a court to stop. Without a restraining order, I fear that there will not be sufficient law enforcement mechanisms to keep Mr. Lutfi away from me.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct to the best of my knowledge and belief.

Executed December 10, 2018, at New York, New York.

DocuSigned by:  
  
DD04883C17A64E0...  
Courtney Michelle Love-Cobain

12/10/18

📶 T-Mobile Wi-Fi 6:50 PM

@ 11% 🔋



REDACTED

REDACTED

one of many being  
published

you deserve the worst

Today 6:41 PM

all your shit is going  
public Friday morning..  
don't say you weren't  
warned

go choke on opiates  
and die.. no one gives a  
shit about you

12/24/18

## DECLARATION OF FRANCES BEAN COBAIN

I, Frances Bean Cobain, declare as follows:

1. I met Osama "Sam" Lutfi in approximately 2010, when he began to associate with my mother, Courtney Love-Cobain, with regularity. I attempted to sever all ties with Mr. Lutfi in September 2017 because he had become verbally abusive—and on a few occasions, physically abusive—toward me.

2. Since I have attempted to disassociate myself from Mr. Lutfi, he has continued to harass and attempt to intimidate me, both directly and indirectly, through social media and my associates and friends. Mr. Lutfi has repeatedly threatened me by stating that he has "confidential personal information" about me (which, if such information exists, I believe must have been illegally obtained), and that he will release it to the public in his discretion. I have no desire to have any contact or association with Mr. Lutfi ever again in my lifetime.

3. Among other steps I have taken to remove Mr. Lutfi's access to me, I have blocked at least eight phone numbers that he has used over time to call me. I have blocked Mr. Lutfi from accessing my social media accounts, but I believe that Mr. Lutfi also has numerous social media alias accounts that he uses to post harassing comments. I continually delete these harassing comments on my social media accounts and block any new known aliases. I also have physically moved homes, and now live in a confidential location in order to remain safe from Mr. Lutfi. Mr. Lutfi has since contacted several of my friends in an effort to reconnect with me. He is persistent in his efforts to contact me despite my clear and consistent message that I do not wish to have any interaction with him.

4. I have attached just a few examples of text messages that I have received from Mr. Lutfi. Among other things, he has called me "the most destructive and full of shit human being on the planet" and "little junkie liar."

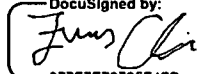
5. This past Saturday, December 8, 2018, someone with the username "samsemails," who I believe is Mr. Lutfi, posted on my Instagram page: "Frances, the biggest sociopath in Hollywood, empty soul." Someone with the username "hd.2.2\_\_5," who I also believe is Mr.

Lutfi, posted: "Frances is a serious sociopath living off her dad's fortune." Apparently, Mr. Lutfi is using new accounts—because, as stated above, I have blocked his previous accounts—to harass me on social media.

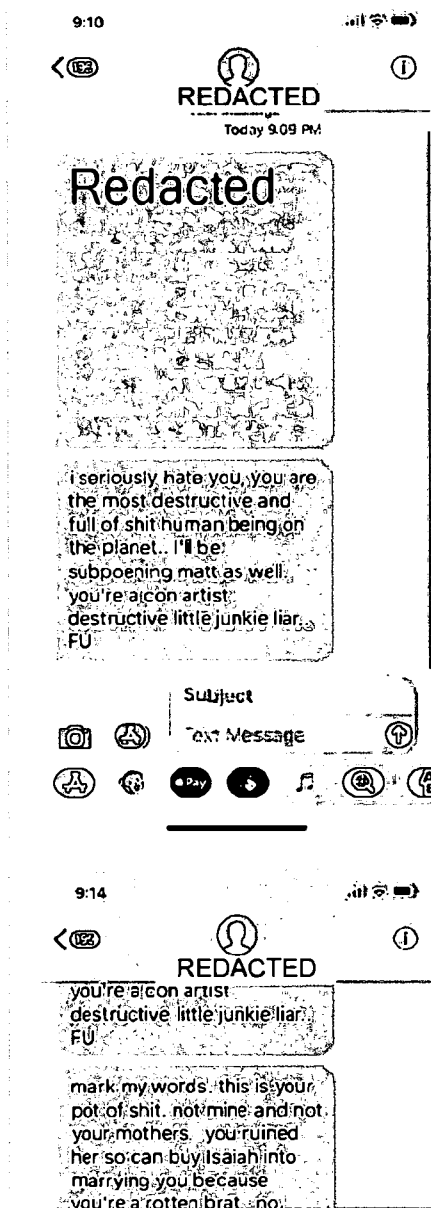
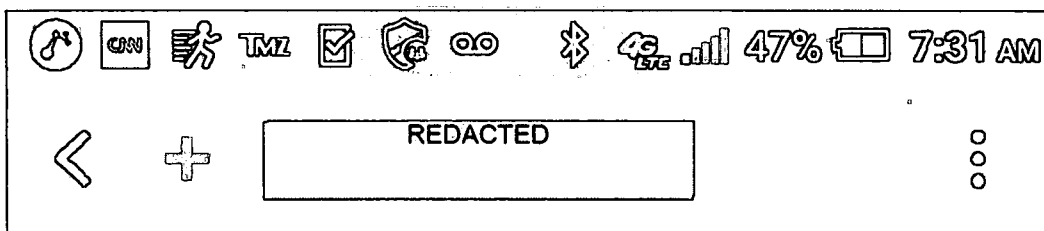
6. I believe that Mr. Lutfi has recently transitioned his abuse to my mother, Courtney Love-Cobain, and my aunt, Jaimee King, since he has been unable to directly contact me. I strongly believe, however, that Mr. Lutfi will continue to harass and abuse me if he is able to find my current contact information. Without a restraining order, I fear that there will not be sufficient law enforcement mechanisms to keep Mr. Lutfi away from me and my family.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct to the best of my knowledge and belief.

Executed December 10, 2018, at Los Angeles, California.

DocuSigned by:  
  
077F7E78706F4F8...

Frances Bean Cobain



0/160



Add text



### **DECLARATION OF JAIMEE ROCHELLE KING**

I, Jaimee Rochelle King, declare as follows:

1. I graduated from Oregon State University and from New York University School of Law and am a member in good standing of the State Bar of Oregon and the State Bar of California.

2. This past summer, my sister, Courtney Love-Cobain, asked me to help her sever a difficult and unhealthy relationship with Osama "Sam" Lutfi. Over the past four months, I have seen for myself how abusive Mr. Lutfi has been to Courtney and my niece Frances Bean Cobain. In addition, Mr. Lutfi has directed his abuse toward me, and, at times, my husband and three children.

3. I first became acquainted with Mr. Lutfi approximately four years ago. Until this past summer, my relationship with Mr. Lutfi was cordial, even friendly. I met with him in person on three or four occasions, and we communicated via email and text messages.

4. In asking me to help facilitate the termination of her business relationship from Mr. Lutfi, Courtney said she wanted, among other things, to ensure that Mr. Lutfi was unable to access her personal email, phone, and social media accounts going forward. I met with Courtney's personal attorney and personal accountant and conducted a preliminary review of Courtney's business and financial statements. During this review, I became concerned by financial information that was potentially inconsistent with Courtney's business records.

5. In August 2018, I met with Mr. Lutfi in person to discuss his professional separation from Courtney and better understand Courtney's business and financial affairs. During this meeting, Mr. Lutfi became extremely verbally aggressive and abusive, shouting at me and angrily refusing to answer my questions. I pointedly informed him that his verbal abuse of me and others was inappropriate, and that he had no right to spy on Courtney or expose her or her family's confidential information. I further explained that I intended to continue my review of Courtney's financial and business records to find and resolve potential improprieties, and that I would like to help Courtney reach an amicable separation with him. After that meeting, the

intensity of Mr. Lutfi's attacks on me and Courtney escalated. He has continued to insult, harass, and threaten me on an unpredictable but regular basis ever since.

6. I have attached a few examples of text messages Mr. Lutfi has sent to me over the past three months. He has told me to "go fuck" myself and has called me, among other things: "fat bitch"; "ugly duckling sister"; "insulting dumb pig"; "very dumb big old lady"; "pathetic sow"; and "miserable cunt."

7. When the verbal assaults began, I did not immediately block Mr. Lutfi's phone number because I still hoped to work out an amicable separation between Courtney and Mr. Lutfi. After receiving several abusive messages, I selected the "Hide Alerts" option on my phone so messages would not appear on my screen unexpectedly. Even with this option, however, Mr. Lutfi's abusive messages popped up, and both my husband and children were exposed to them at various times. My nine-year-old daughter occasionally picked up my phone and Mr. Lutfi's vitriolic messages appeared on the screen on at least two occasions—both scaring and confusing her. I informed Mr. Lutfi of this fact and requested that he use email to communicate with me if he was going to use such language because my daughter cannot access my email account. His reply was: "shut the fuck up Jaimee. get my the fucking agreement an no. it's 2 million period!"

8. In addition to sending harassing and threatening text messages, Mr. Lutfi has been calling my cell phone and home phone repeatedly, at all hours of the day and night. For example, on Saturday, December 1, 2018, between 4:23 a.m. and 4:40 a.m., I received six calls on my mobile phone from an unknown number. I did not answer those calls. But my husband recently answered the home phone when an unknown number similarly appeared on our caller ID. When my husband asked who was calling, I could hear Mr. Lutfi yelling at my husband and demanding to speak with me immediately. The caller then called me several derogatory names, including "fucking cunt." My husband hung up the phone and a few minutes later received additional calls from an unknown number. He declined to answer those calls and we blocked Mr. Lutfi's number and unplugged our home phone due to fear of the harassing calls continuing. We were forced to



explain this highly disturbing situation to our children and instruct them not to answer the phone from any unidentified numbers.

9. In addition to contacting me directly, Mr. Lutfi has contacted my family and colleagues and made untrue and defamatory statements about me, including that I had been fired from my job, that I am "broke," and that I have "been out of work for two years." I also believe that Mr. Lutfi has accessed my social media accounts and made comments meant to embarrass or harm me and my family. As of last week, I have made all of my social media accounts private, and have blocked all unknown users.

10. We recently took steps to validate Courtney's identity with various social media and email companies and reset the passcodes to these accounts. Upon review of two of Courtney's email accounts, we noticed that both accounts automatically forwarded all messages to a third email account that Courtney was unfamiliar with. Fortunately, we were able to validate Courtney's identity and gain ownership of this third account. Immediately after blocking third-party access to this account, Mr. Lutfi texted me: "that account is not yours" and "I am calling the police." I received another set of text messages from Mr. Lutfi, stating: "you hear me you psychotic cunt??"; "you're going to regret this you fat bitch . . ." I blocked Mr. Lutfi's phone number after receiving these text messages, but the calls from other numbers have continued. Since regaining access to Courtney's email account, I have been informed by the email company that a person believed to be Mr. Lutfi had taken efforts to regain control of that account, and such efforts have continued, unsuccessfully, as recently as Sunday, December 9, 2018.

11. Mr. Lutfi's behavior has caused extreme emotional distress and disruption to me and my family. We have become afraid of Mr. Lutfi due to his vitriolic threats and abusive behavior. This fear is amplified in light of Mr. Lutfi's notorious reputation in the industry, which I believe shows that he is both highly manipulative and abusive. Mr. Lutfi has a (well documented and easily searchable) history of allegedly engaging in stalking and harassing behavior very similar to the description I have set forth above. I understand that he has had multiple restraining orders issued against him related to other parties.

12. Mr. Lutfi's behavior has caused my family to unplug our home phone every night and avoid all calls from unknown parties. It has caused my children to fear answering the phone at all. My youngest daughter tearfully asked me last week if Mr. Lutfi could come to our home and hurt us, or hurt her Aunt Courtney or Cousin Frances.

13. I strongly believe that Mr. Lutfi will persist in the harassing, threatening, and abusive behavior described above, and I fear that his behavior toward us will continue unless and until he is ordered by a court to stop. Without a restraining order, I fear that there will not be sufficient law enforcement mechanisms to keep Mr. Lutfi away from us.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct to the best of my knowledge and belief.

Executed December 10, 2018, at Portland, Oregon.

DocuSigned by:  
*Jaimee King*  
606ADF2E6A1B4B0...

Jaimee Rochelle King, Esq.

Sam Lunt REDACTED

you never called back. You're a very dumb big old lady

Sep 5, 2018 00:04:07

Sam Lunt REDACTED

you never called back. You're a very dumb big old lady

Sep 5, 2018 00:04:08

2018-09-07 03:47

Sam Lunt REDACTED

Where's this agreement you drafted?? All you do is lie, put the donuts down and get this shit done you pathetic sow

Sep 7, 2018 3:47:07

2018-09-07 08:12

REDACTED

Sam, I will be in LA the week of September 17th. Do you have time to meet with me then, with your lawyer, to go over the agreement with Courtney? It would be great for you to bring a financial summary of the money you feel you are owed so we can close that out as well. In the meantime, can you please provide the login information for Courtney's social media accounts and confirm that you have ceased accessing them, and that you are not engaged in any activities or communication on Courtney's behalf. Please let me know what day the week of the 17th works. I am sure we can borrow an office at Lavelly Singer to meet.

Sep 7, 2018 8:12:33

On another note, I wanted to point out that my daughter usually has my phone in the morning and evening to play games or watch shows while I am busy. Your texts seem to pop up at these times, and have been both confusing and distressing for her to see. If you would like to continue such unhealthy dialogue, I'd ask you to send me vitriolic emails instead of texting, to avoid such hostilities being sprung on the children unexpectedly. I actually see no need for such disrespect, as I still believe we can come to a mutually acceptable resolution to this situation if we continue to work together and talk it out. I appreciate the continued communication.

2018-09-07 20:21

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Sam Lutz

REDACTED

Ross is here btw if you'd like to call and lie to him.  
I'm sure he will like that

Sep 7, 2018 20:21:05

2018-09-07 22:23

Sam Lutz

REDACTED

well I explained to him thoroughly how deceitful and  
full of shit you are and what a low life you truly are.

Sep 7, 2018 22:23:57

2018-09-08 02:56

Sam Lutz

REDACTED

miserable cunt

Sep 8, 2018 2:56:48

Sam Luan REDACTED

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You have to excuse my responses they're in result  
to the indignity I've felt by the things you guys have  
been saying. That's actually the last thing I've ever  
expected from any of you

Oct 15, 2018 15:33:33

2018-11-25 01:32

Sam Luan REDACTED

you ignorant cow. you owe Ross money and you  
better pay him back this week before he sues the  
fuck out of your fat ass.

Nov 25, 2018 1:32:14